

8/3/04
69FR 46597

rec. RDB 10/14/04
11:30 am

(9)

Dear Sirs,

My name is Dave Grabski. I am a FAC Program Owner at a US nuclear utility. Please consider the following comments regarding Code Case N-597-1

Specific Comment:

Please clarify Condition No. 4. As currently written, Condition 4 could be interpreted to only permit repair and replacement of piping when the tmin is exceeded. The purpose for Code Case N-597-1 was to allow analytical evaluation of pipe thinning below tmin. Condition 4 seems to imply that repairs and replacements are the only options when tmin is exceeded, i.e., no analytical evaluation.

General Comment: The conditions stipulated for the use of this code case, particularly Condition 2 regarding NRC review and approval, are unreasonably burdensome and effectively void any reason for utilities to implement it.

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F-RIDS = ADM-03

Code = (Wally-Norris) (WEN)

Template = ADM-013